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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

In re:) Chapter 11
)
POWELL VALLEY HEALTH CARE, INC.,) Case No. 16-20326
)
Debtor-in-Possession.)

**FOURTH MOTION TO VACATE AND CONTINUE HEARING ON
DEBTOR'S MOTION OF THE DEBTOR FOR AUTHORIZATION TO
CONDUCT RULE 2004 EXAMINATION OF THE MALPRACTICE
INSURANCE COMPANIES AND THE JOINDER AND OPPOSITION FILED
THERE TO**

Powell Valley Health Care, Inc. ("PVHC", or the "Debtor"), the debtor and debtor in possession in the above captioned case, hereby files this motion to vacate and continue the hearing set for April 5, 2017, at 2:00 p.m., on the Debtor's *Motion of the Debtor for Authorization to Conduct Rule 2004 Examination of the Malpractice Insurance Companies* (the "Motion for 2004 Exam") [Doc. 353], the *Insurance Companies' Joint Opposition to Motion for Authorization to Conduct Rule 2004 Examination and Request to be Heard* [Doc. 359] filed by UMIA Insurance, Inc. ("UMIA"), Lexington Insurance Company ("Lexington"), and Homeland Insurance Company of New York ("Homeland") (collectively, the "Insurance Companies") and the *Joinder to Motion of the Debtor for Authorization to Conduct Rule 2004 Examination of the Malpractice Insurance*

Companies and Joinder to Response to Insurance Companies' Joint Opposition to Motion for Authorization to Conduct Rule 2004 Examination and Request to be Heard [Doc. 368] filed by the Official Committee of Unsecured Creditors (the "Committee"), and in support thereof shows the Court as follows:

1. At this juncture, the Debtor and the UCC are currently in the process of drafting, reviewing and revising an agreed upon Disclosure Statement, Plan and Plan related documents. The undersigned believes that the Debtor may file its Disclosure Statement and Plan as early as April 10, 2017.

2. Based on the foregoing, it is probable that the Debtor withdraws its Motion for 2004 Exam in the near future. Thus, the Debtor believes that the interests of all parties would be better served if the parties focused their efforts on drafting, reviewing and revising an agreed upon Disclosure Statement, Plan and Plan related documents, rather than spending time preparing to argue the merits of the Motion for 2004 Exam.

3. Accordingly, the Debtor requests that the hearing on the Motion for 2004 Exam be vacated and continued for approximately thirty (30) days.

4. The Committee has consented to the relief requested herein.

WHEREFORE, the Debtor respectfully requests the Court enter an order substantially in the form attached hereto at Exhibit A vacating and continuing the hearing on the Motion for 2004 Exam.

Dated: April 4, 2017.

**MARKUS WILLIAMS YOUNG &
ZIMMERMANN LLC**

By: /s/ Bradley T. Hunsicker
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Counsel for the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

The undersigned certifies that on April 4, 2017, a copy of the foregoing was served *electronically* upon those parties indicated below:

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/s/Bradley T. Hunsicker

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